

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

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**PLAINTIFF’S THIRD MOTION TO COMPEL**

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Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully moves this Court to compel Defendants to comply with Plaintiff’s deposition notices.

As explained in the accompanying Memorandum, Defendants are refusing to comply with deposition notices, refusing to schedule depositions in an orderly fashion, and generally abusing the discovery process. Defendants’ refusal to comply with their obligations under the Federal Rules of Civil Procedure is stalling the progression of this litigation. For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum, this Court should grant this Motion.

As required by Local Rule 7.01, counsel for Plaintiff hereby certifies that they have attempted to confer in good faith with counsel for each of the Defendants regarding the nature of this Motion, the issues raised in this Motion, and the relief requested in this Motion.

Dated: February 21, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Plaintiff's Third Motion to Compel to be electronically filed with the Clerk of the Court on February 21, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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